

Appl. No. 09/504,159
Amd dated December 10, 2003
Reply to Office Action of September 12, 2003

REMARKS

This amendment is responsive to the Office Action dated September 12, 2003. Applicants have amended claims 1 and 56, and have added claims 93-108. Claims 75-92 were restricted by the Examiner, and are withdrawn herein with traverse. Claims 1-17, 20-22, 25-31, 56-73 and 93-108 are pending upon entry of this response.

As a preliminary matter, Applicants would like to thank Mr. John Weiss, the Examiner's Supervisor, for discussing the present Office Action and the general examination of the subject case. Mr. Weiss and Mr. Sieffert, Applicants' representative, participated in the discussion. During the telephonic interview, Mr. Sieffert generally discussed Applicants' concern with the examination of the present application to date. In particular, Applicants expressed concern in the following areas: (1) that the Office has not yet applied well-reasoned analysis in a manner consistent with the statutory and judicial requirements in establishing a prima facie case of unpatentability of Applicants' claimed invention, (2) the Office has not addressed the objective evidence and secondary considerations presented by the Applicants' declaration, and (3) in the last Action, the Office constructively restricted Applicants claims without applying reasoned analysis showing one-way or two-way distinctiveness and an examination burden, as required. During the interview, no amendments were proposed.

Claim Rejection Under 35 U.S.C. § 101

In the Office Action, the Examiner rejected claims 1-17, 20-22, 25-31, 56-63 and 72-73 under 35 U.S.C. 101 stating that the claimed invention is directed to non-statutory subject matter. Applicants respectively traverse the rejection. Nevertheless, to expedite prosecution, Applicants have amended the claims for purposes of clarifying that the claims are directed to the technical arts.

Restrictions

In the Office Action, the Examiner asserted that newly added claims 75-92 were "independent or distinct from the invention originally claimed," and that the claims were withdrawn from consideration as directed to a non-elected invention. The Examiner's analysis, however, was incomplete for several reasons.

Appl. No. 09/504,159
Amd dated December 10, 2003
Reply to Office Action of September 12, 2003

First, for a restriction requirement to be proper, the Examiner must show two criteria: (1) the claimed inventions are distinct, and (2) there is a "serious burden" on the Examiner. These requirements are clearly stated in MPEP 803, and must be met regardless of whether examination has commenced.

Regarding the first requirement, the Examiner simply listed elements of claims 75-92 that were not already present in the pending claims. The Examiner offered no other analysis as to why claims 75-92 were distinct from the pending claims. In order to show related inventions to as distinct, however, the Examiner must apply the analysis set forth in MPEP 806.05(c)-(i). For example, the Examiner may demonstrate that the related inventions are combination/sub-combinations, and then show that the inventions have two-way distinctness under 806.05(c). In the Office Action, the Examiner failed to provide any analysis whatsoever other than listing features of the newly added claims.

Regarding the second requirement, the Examiner completely overlooked the requirement to demonstrate that examination of the newly added claims present a "serious burden," as required by MPEP 803. Applicants direct the Examiner to MPEP 808.02, which requires that for restriction to be proper for distinct inventions, the Examiner must show that the inventions must be classified separately or has achieved separate status in the art. The Examiner provide no evidence on this point, and appears to completely overlook this requirement.

In the event the Examiner maintains the restriction requirement, Applicants request a complete reasoned analysis in accordance with the requirements of the MPEP.

Claim Rejection Under 35 U.S.C. § 103

Before addressing the specific claim rejections under 35 U.S.C. § 103, Applicants would like to make some general comments regarding the Examiner's analysis to date. First, many of the references and comments made by the Examiner are directed to automatic adjudication / settlement of claims or disputes. Many of Applicants' claims, however, recite elements directed to techniques for assisting parties, with perhaps the aid of dispute resolution specialist, in resolving disputes. For example, Applicants; claim 1 recites executing software to apply a case-based reasoning system to case information to produce a result for use in selection of a mode of resolving the dispute in accordance with an online dispute resolution process, and presenting the

Appl. No. 09/504,159

Amd dated December 10, 2003

Reply to Office Action of September 12, 2003

result of the application of the case-based reasoning system to the case information to the one or more parties via the computer network to assist the parties in resolving the dispute. The Examiner has apparently confused Applicant's recited elements for assisting the parties in resolving an online dispute resolution with the notion of automatically adjudicating a dispute. This is probably why the Examiner continues to cite neural networks and automated adjudication systems, which are unrelated to the elements of Applicants' claims. Applicant's claimed invention does not recite elements for automatically adjudicating a dispute, but rather systems and method for assisting the users in resolving disputes in a network environment, such as the Internet.

Second, as discussed with the Examiner's Supervisor during the above-referenced telephonic interview, the Examiner has repeatedly failed to address specific elements recited by Applicants' claims. Instead, the Examiner has written detailed passages describing features of the cited references that are unrelated to Applicants' claims. For example, with respect to claim 1 in the present Office Action, the Examiner admits that the primary reference, Sloo, does not disclose certain features of Applicants' claims. The Examiner then provides a detailed description of NueralTech's CADRE software and First of Omaha's Merchant Processing System without pointing to any specific passages that describe the features of Applicants' claim 1.¹ Nevertheless, the Examiner rejects claim 1 using rather erroneous logic that appears to be based on his subjective view of software systems. This subjective analysis is impermissible and contrary to well-defined requirements for establishing a prima facie case of obviousness. To the extent the Examiner maintains the rejections, Applicants request that the Examiner focus on the elements of Applicants' claims, and provide a detailed, objective analysis that addresses all of the criteria for establishing a prima facie case of obviousness.

Third, in numerous places within the present Office Action the Examiner has taken Official Notice of facts not in the record. As previously pointed out by the Applicants, the Examiner is permitted to take official notice of facts outside of the record only when those facts are capable of "instant and unquestionable demonstrations as being well-known."² Moreover, when a rejection is based on facts within the personal knowledge of the examiner, the data

¹ See, e.g., Office Action, pp. 9-10, where the Examiner describes the systems of the cited references at length without addressing the limitations of Applicants' claim 1.

² See MPEP 2144.02 quoting *In re Ahlert*, 424 F.2d 1088, 1092, 165 USPQ 418, 420 (CCPA 1970).

Appl. No. 09/504,159
Amd dated December 10, 2003
Reply to Office Action of September 12, 2003

should be stated as specifically as possible, and the facts must be supported, when called for by the applicant, by an affidavit from the Examiner. Such an affidavit is subject to contradiction or explanation by the affidavits of the applicant and other persons.³ Applicant hereby requests that, to the extent the Examiner continues taking official notice of *any* facts not in the record, he provided an affidavit that describes the facts in detail, the public nature of those facts, and specific dates when those facts were publicly available.

Claims 1-17, 20-22, 25-31, 56-73

In the Office Action, the Examiner rejected claims 1-17, 22, 25, 27-29 and 56-73 under 35 U.S.C. 103(a) as being unpatentable over Sloo (USPN 5,895,450) in view of Burchetta et al. (USPN 6,330,551), and in further view of NeuralTech, Inc. ("NeuralTech") and Cookmeyer II (USPN 6,363,384).

To establish a prima facie case of obviousness, three basic criteria must be met. First, the prior art reference or references when combined must teach or suggest each and every claim limitation. Second there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Finally, there must be a reasonable expectation of success.⁴ The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on Applicant's disclosure. The reasoning set forth by the Examiner fails these well-established criteria. Accordingly, Applicant respectfully traverses the rejection under 35 U.S.C. 103(a) for the reasons set forth herein.

In rejecting Applicants' claims, the Examiner relies primarily on the disclosure of Sloo, which is directed to a network-based complaint handling system. However, as discussed above, Sloo is directed to automatic adjudication of a dispute, not to methods and systems for assisting parties in resolving a dispute via online dispute resolution. The Examiner provides a lengthy discussion of how Sloo provides a central program that "evaluates all of the gathered information ... to arrive at a judgment."⁵ The Examiner emphasizes that the program in Sloo may apply

³ See 37 CFR 1.104(d)(2).

⁴ See MPEP 706.02(j) quoting *In re Vaick*, 947 F2d 488, 20 USPQ2d 1438 (Fed Cir. 1991).

⁵ Office Action, page 9.

Appl. No. 09/504,159
Amd dated December 10, 2003
Reply to Office Action of September 12, 2003

artificial intelligence with neural networks, fuzzy logic, and/or genetic algorithms to analyze various scenarios to determine the best solution or outcome to a dispute. Again, this analysis is irrelevant to Applicant's claimed invention for assisting the users in resolving disputes via online dispute resolution processes. Applicants' claimed invention, and the systems described generally by the present application, are not directed to a system that automatically adjudicates a dispute.

As admitted by the Examiner, Sloo fails to disclose certain requirements of each of Applicants' independent claims 1, 56 and 64.⁶ As one example, the Examiner states that Sloo fails to disclose applying a case-based reasoning system to case information to produce a result for use in selection of a mode of resolving the dispute in accordance with an online dispute resolution process, as required by claim 1. In fact, the processes described in Sloo relate entirely to automated adjudication via a computer automated process or a negotiator, judge or jury. As described in great detail in the accompanying declaration, the automatic adjudication-based system described by Sloo is entirely inapplicable, indeed unworkable, for situations requiring online dispute resolution, e.g., online marketplaces. Online dispute resolution process, as recited by claim 1, as applied to real-world online marketplaces is a conciliation-based process that requires unique considerations and innovations entirely unrelated to the inapplicable and fictitious complaint handling system of Sloo that seeks to apply artificial intelligence to "define laws" and "curb behavior."⁷

Similarly, the Examiner admits that Sloo does not disclose comparing the case information to facts of previously resolved disputes to produce a result for use in selection of a mode of resolving the dispute, as required by claim 56. As another example, Sloo does not disclose a database to store facts and outcomes of previously resolved disputes, and a server that compares case information to the facts of previously resolved disputes stored by the database to produce a result for use in selection of a mode of resolving the dispute, as required by claim 64.

In an attempt to address these admitted deficiencies of Sloo, the Examiner appears to rely on all of Bruchetta, Cookmeyer, NeuralTech and First of Omaha in a patchwork fashion.⁸ This reliance is clearly misplaced. With respect to Cookmeyer does not disclose or suggest these requirements of Applicants' claims. In fact, Cookmeyer is in not even remotely related to

⁶ See Office Action, 2/13/03, page 5.

⁷ See, e.g., columns 15 & 16.

⁸ Office Action, pp. 9-10.

Appl. No. 09/504,159
Amd dated December 10, 2003
Reply to Office Action of September 12, 2003

electronic dispute resolution. Instead, Cookmeyer discloses an expert system for analyzing network protocols, e.g., Ethernet, Token Ring, and the like.

Moreover, Cookmeyer merely discusses an analyzer that "combines a rules based knowledge base together with a structured interview analysis which allows the user to follow interview questions in focusing the problem definition."⁹ The Examiner has done nothing more than select a reference to demonstrate a rule-based computing system that can be used for problem solving, e.g., a protocol analyzer of Cookmeyer for identifying network problems. Applicant has no doubt that the Examiner could have selected any of a multitude of references for this proposition.

However, the proposition is wholly unrelated to Applicants' claims, and clearly fails to teach or suggest the comparison of case information to assist in selection of a mode for resolving a dispute in accordance with and online dispute resolution process, as required by Applicant's claim 1. Sloo clearly fails to show this, as readily admitted by the Examiner. Where is this shown in the network analysis described by Cookmeyer?

NeuralTech and First of Omaha add nothing to address the deficiencies of Sloo. For example, NeuralTech is nothing more than a marketing brochure. With respect to NeuralTech, the Examiner states "NeuralTech discloses "CADRE" ... that automates all aspects of the retrieval, chargeback and dispute resolution process for acquirers and issuers." The Examiner further states that "First of Omaha Merchant Processing announces today that it has entered into a long term agreement with NeuralTech, Inc. to further automate its award winning chargeback/retrieval process. **How are these passing references related to the application of a case-based reasoning system for comparison of case information to assist in selection of a mode for resolving a dispute in accordance with and online dispute resolution process?** The Examiner has admitted that these elements of Applicants' claims are not shown in Sloo, and has not demonstrated how the other cited references teach these elements. The passing references to dispute resolution in NeuralTech is meaningless. Moreover, the contract between First of Omaha Merchant Processing and NeuralTech has no bearing on the recited elements of Applicants' claims. As stated above, Applicants' require an objective, reasoned analysis in

⁹ Cookmeyer, column 6, lines 49-52.

Appl. No. 09/504,159
Amd dated December 10, 2003
Reply to Office Action of September 12, 2003

accordance with the well-established requirements for establishing a prima facie case of obviousness. Subjective conjecturing is not permitted.

The Examiner's statement regarding Burchetta provides clear evidence that Applicants' claim elements have been ignored. With respect to Burchetta, the Examiner refers to passages that describe how the system of Burchetta automatically settles online disputes. With respect to Burchetta, the Examiner states that the automated dispute resolution system automatically determines whether the dispute is resolved in 3 rounds, or, automatically order the first party to order to pay the second party. As another example, in column 8, lines 40-53, Burchetta states the system instantly compares each demand to the settlement offer for each round. If the demand and offer match or are within some pre-established range, the case is settled. These statements relate to automatically resolving a dispute. They do not relate to application of a case-based reasoning system for comparison of case information to assist in selection of a mode for resolving a dispute in accordance with and online dispute resolution process, as recited by Applicants claim 1. These elements of Applicant's claim 1 specifically refer to assisting the parties in selecting a mode for resolving the dispute, not automatically resolving the dispute for the parties.

To establish a prima facie case of obviousness, it is required that the prior art references must teach or suggest all of the claim limitations. When considering Applicant's invention as recited by independent claim s 1, 56 and 64 as a whole, the prior art of record fails the teach or suggest these claim limitations. Consequently, the rejection is erroneous and must be withdrawn.

Claims 2, 7-13, 15-19, 28-29 and 72

As another example, the references fail to teach or suggest automatically selecting one of two modes of resolving the dispute based on the result from the case-based reasoning system, the first mode requiring the online dispute resolution process being driven to assist the parties in resolving the dispute and the second mode involving a human dispute resolution specialist, as required by Applicant's claim 2. As described in the present application, Applicants' online dispute resolution system may support a number of modes to assist the parties in resolving the dispute, including by providing an environment for direct dispute resolution by the parties or by

Appl. No. 09/504,159
Amd dated December 10, 2003
Reply to Office Action of September 12, 2003

utilizing a dispute resolution specialist. Claim 2 recites automatically selecting one of two modes as a result of the case-based reasoning system.

In rejecting claim 2, the Examiner admits that Sloo fails to disclose any of these elements, and again seeks to modify the adjudication-based complaint handling apparatus of Sloo with the network analyzer of Cookmeyer. However, as Cookmeyer describes a network analyzer, it clearly fails to teach or suggest automatically selecting one of two modes of resolving the dispute based on the result from the case-based reasoning system, the first mode being completely driven by an electronic agent and the second mode involving a human dispute resolution specialist, as required by Applicant's claim 2.

The automatic dispute resolution system of Bruchetta, as described above, is irrelevant to Applicants' recited elements regarding automatically selecting modes by which the users resolve the dispute with the online dispute resolution system. Automatically selecting modes of resolution to be carried out by the parties is fundamentally different than trying to automatically resolve a dispute, as described in Bruchetta.

Again, to establish a prima facie case of obviousness, it is required that the prior art references must teach or suggest all of the claim limitations. , the references fail to teach or suggest automatically selecting one of two modes of resolving the dispute based on the result from the case-based reasoning system, the first mode requiring the online dispute resolution process being driven to assist the parties in resolving the dispute and the second mode involving a human dispute resolution specialist, as required by Applicant's claim 2. Consequently, this rejection is erroneous and withdrawal is requested.

Claims 4, 57 and 65

With respect to claims 4, 57 and 65, the Examiner's comments have absolutely no bearing on the recited claim elements. Claim 4, for example, recites executing software to apply a case-based reasoning system to the case information to produce a result for use in selection of a mode of resolving the dispute in accordance with an online dispute resolution process, wherein the case-based reasoning system contains a history file that contains patterns and precedents, and further comprising applying the patterns and precedents to generate an outcome prediction for use in selection of the mode for resolving the dispute.

Appl. No. 09/504,159
Amd dated December 10, 2003
Reply to Office Action of September 12, 2003

In contrast, the Examiner asserts that "Sloo discloses to use artificial intelligence techniques to process the information ... For example, the program may compare all the information known about a dispute to the information known about potential judges and jurors to select the most appropriate judge or jurors to resolve the dispute." The Examiner offers no other evidence. This cited portion of Sloo makes no mention of a history file that contains patterns and precedents. This makes no mention of even looking at previously collected information whatsoever, let alone applying the patterns and precedents to generate an outcome prediction for use in selection of the mode.

Claims 5-6, 58-59 and 66-67

Neither Sloo fails to disclose or suggests presenting an outcome prediction that includes one or more likely outcomes and associated probabilities of occurrence to assist the parties in selecting the mode of resolving the dispute as described, for example, by Applicant's claim 5.

In rejecting these claims, the Examiner's erroneous and inapplicable cites various passages of Sloo for applying neural networks, fuzzy logic or other algorithms for automatically adjudicating a case. As previously stated by the Applicant, this is fundamentally different from a dispute resolution process, as recited in claims.

Claim 11

Claim 11 recites, "wherein the dispute resolution specialist resolves the dispute by transitioning from a mediation stage to an arbitration stage." In rejecting claim 11, the only evidence introduced by the Examiner from a cited prior art reference is his statement that Sloo discloses "to allow either party to appeal a decision that was rendered using either of the three previous settlement options." Again, this statement is entirely unrelated to the elements of claim 11.

Claim 14

The Examiner continues to rely on the combination of Sloo with Burchetta in an effort to establish the obviousness of claim 14. Further, it appears that the Examiner continues to misunderstand either the scope of Burchetta or the recited elements claim 14. In particular, claim

Appl. No. 09/504,159
Amd dated December 10, 2003
Reply to Office Action of September 12, 2003

14 requires creating a contract between the one or more parties stating the willingness to abide by a recommended resolution, i.e., after the resolution is proposed to the parties.

In rejecting claim 14, the Examiner generally refers to a users agreement of Sloo "to encourage the users to file complaints." CLEARLY THE USER AGREEMENT OF SLOO IS CREATED BEFORE A RESOLUTION IS PROPOSED, WHICH IS DIRECTLY CONTRARY TO THE LITERAL LANGUAGE OF CLAIM 14. In fact, the user agreement of Sloo is, according to the Examiner, created even before the complaint is filed. This is yet another illustration of how Applicants claim language has been ignored.

Similarly, Burchetta does not disclose or suggest creating a contract between the one or more parties stating the willingness to abide by a recommended resolution that has been generated by a dispute resolution specialist," as required by claim 14. As argued in the previous Response and Request for Reconsideration, in contrast to this requirement of claim 14, Burchetta discloses that a previously obtained user agreement binds the claimant to settle the claim for the amount specified by the on-line dispute settlement system based on the comparison of demands and offers received from the parties to each other and preestablished conditions.¹⁰

The portion of Applicants' disclosure quoted by the Examiner is particularly instructive in illustrating the difference between the disclosure of Burchetta and claim 14. "The dispute resolution specialist also generates a final recommended resolution that, once accepted by the one or more parties, is recited in a binding contract between the one or more parties stating a willingness to abide by the final recommended resolution."¹¹ In other words, the disclosure in Burchetta of a user agreement that binds users to the result of specified by the system before the system reaches the result is directly contrary to the requirement of claim 14 that a resolution first be recommended and then a contract be created accepting the recommended resolution.

The Examiner has again blatantly overlooked elements of Applicant's claims. The references cited by the Examiner, even if combinable, fail to teach or suggest each and every limitation of Applicant's claims, as required by well established principles of patent law to establish a prima facie case of obviousness. This rejection is erroneous and must be withdrawn.

¹⁰ Burchetta, column 2, lines 3-17.

¹¹ Application, page 2, lines 7-11.

Appl. No. 09/504,159
Amd dated December 10, 2003
Reply to Office Action of September 12, 2003

Claim 22

Sloo fails to disclose a forum storing data on participation of a buyer or seller in dispute resolution process to resolve electronic commerce disputes in an electronic marketplace. As described by the Examiner, Sloo describes a process for monitoring compliance with a particular judgment, but fails to provide a forum that indicates whether buyers or sellers have agreed to participate in an electronic dispute resolution process for an electronic marketplace, as required by claim 22 as amended. The compliance process described by Sloo only relates to a user's compliance with a judgment, and is unrelated to the elements recited by Applicant's claims. In fact, Sloo is entirely devoid of any teaching or suggestion of a forum that stores data on participation of buyers or sellers in a dispute resolution process. The other references cited by the Examiner do nothing to address this deficiency.

Lack Of Motivation To Modify The Automatic Adjudication System Of Sloo With The Network Analyzer Of Cookmeyer

As described above, in addition to the teaching or suggestion of each and every element, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the automatic adjudication system of Sloo with the network analyzer of Cookmeyer.

It appears that the conclusion of obviousness advanced by the Examiner relies on a motivation plucked directly from Applicants' own disclosure, rather than the prior art. Along these lines, the Court of Appeals for the Federal Circuit has recently stated: "[the] factual question of motivation is material to patentability, and (can) not be resolved on subjective belief and unknown authority."¹² This finding must be based upon substantial evidence, and not subjective musings or conjecture by the Examiner.¹³ Deficiencies in the evidentiary record cannot be cured by general conclusions such as "general knowledge" or "common sense."¹⁴ Accordingly, the Examiner cannot rely on unsupported, conclusory statements to close holes in the evidentiary record.¹⁵ Unless the Examiner can establish an evidentiary record based on concrete prior art references that establish that it would have been obvious to a person with

¹² *Id.* at 1434.

¹³ *Id.*

¹⁴ *Id.*

Appl. No. 09/504,159
Amd dated December 10, 2003
Reply to Office Action of September 12, 2003

ordinary skill in the art to incorporate the features of Applicant's dependent claims, the claims should be allowed.

For at least these reasons, the Examiner has failed to establish a prima facie case for non-patentability of Applicant's claims under 35 U.S.C. 103(a). Withdrawal of this rejection is requested.

Failure to Achieve Applicant's Claimed Invention

When the totality of the Examiner's arguments are viewed, the Examiner generally asserts that it would have been obvious to one skilled in the art to modify the automatic adjudication system in view of the expert system of Cookmeyer to achieve the Applicant's claimed invention. However, the Examiner fails to appreciate that Sloo describes an automated, networked judicial system that seeks to replace or otherwise automate the functions of the judge and the jury. **Thus, even if the modifications proposed by the Examiner were achieved, the resultant system would still be entirely different from Applicant's claimed invention.**

As emphasized by the Applicant, and as is made clear by the differences discussed above between Applicant's claims and the cited references, Applicants' system applies historical data through manual or automated processes to facilitate online-dispute resolution processes. Sloo conversely claims the ability to create some form of "case law" or generally accepted "judgments" based on very impractical and vague reference to other data. Applicants' system uses precedents to aid parties recognize fairness and come to a mutually agreeable settlement, and does not utilize data to form a judgment. Rather, Applicants' system utilizes historic data to present reasonable alternatives to help parties better articulate their issues, help parties recognize compromise, and move parties toward mutual agreement. Moreover, substantial evidence of success is set forth below that demonstrates how the described and claimed processes of the present application is effective at both of these novel processes: helping online parties communicate and identify a fair resolution in a self-service manner through the use of presenting historic relevant data, and achieve the same with the assistance of a dispute resolution specialist.

Even if Sloo were modified in accordance with the other cited references, the resulting system would still focus on automatically adjudicating cases, and would not achieve an online

¹³ *Id.*

Appl. No. 09/504,159
Amd dated December 10, 2003
Reply to Office Action of September 12, 2003

dispute resolution system that has, for example, practical use in electronic commerce, e.g., online marketplaces

Objective Evidence and Secondary Considerations

In their previous response, Applicant's submitted a declaration describing objective evidence and secondary considerations, such as commercial success, which must be considered by the Examiner in every case in which they are presented.¹⁶ The Examiner failed comment on, let alone consider, the evidence set forth by the Applicant.

In particular, to aid the Examiner in appreciating the novelty and non-obviousness of Applicant's claimed inventions, Applicants submitted a declaration from Mr. Steven D. Abernethy, Chief Executive Officer, President and Co-founder of SquareTrade, Incorporated ("SquareTrade"), the assignee of the present application.

In summary, the declaration submitted detailed evidence that:

1. Demonstrated the complete inapplicability of the cited prior art with respect to online dispute resolution processes and systems claimed by the Applicant,
2. Further distinguished Applicant's claimed invention from the systems described by the cited prior art;
3. Offered substantial evidence of commercial success having a direct nexus with Applicant's claimed invention;
4. Offered substantial evidence of long-felt and unsolved need in industry that was addressed by Applicant's claimed invention; and
5. Offered substantial evidence of industry recognition for awards for pioneering innovation in the area of online dispute resolution, as described and claimed in the present application.

The nature and considerable amount of evidence and secondary considerations offered in the submitted declaration was directly relevant to the issue of non-obviousness before the Examiner. Therefore, the Examiner must give "substantial weight" to this evidence, as set forth by the Supreme Court. As this evidence clearly demonstrates the non-obviousness nature of

¹⁶ MPEP 716.01.

Appl. No. 09/504,159
Amd dated December 10, 2003
Reply to Office Action of September 12, 2003

Applicant's claimed invention, withdrawal of the rejections under 35 U.S.C. 103(a) is required.
Applicants request consideration of this evidence.

New Claims:

Applicant has added claims 93-108 to the pending application. The applied references fail to disclose or suggest the inventions defined by Applicant's new claims, and provide no teaching that would have suggested the desirability of modification to arrive at the claimed inventions. No new matter has been added by the new claims.

CONCLUSION

All claims in this application are in condition for allowance. Applicant respectfully requests reconsideration and prompt allowance of all pending claims. Please charge any additional fees or credit any overpayment to deposit account number 50-1778. The Examiner is invited to telephone the below-signed attorney to discuss this application.

Date:

By:

December 10, 2003
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